## **EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM** U.S. DEPARTMENT OF LABOR Washington, D.C. 20210

CLASSIFICATION Workforce Information CORRESPONDENCE SYMBOL DNPTTA/Workforce Information DATE May 10, 2013

TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. ADVISORY:

TO:

STATE WORKFORCE AGENCIES

STATE WORKFORCE ADMINISTRATORS

STATE LABOR COMMISSIONERS

STATE AND LOCAL WORKFORCE BOARD CHAIRS AND DIRECTORS

STATE WORKFORCE LIAISONS

STATE LABOR MARKET INFORMATION, WORKFORCE

INFORMATION, OR RESEARCH DIRECTORS

FROM:

Assistant Secretary

SUBJECT:

Program Year (PY) 2013 Workforce Information Grants to States (WIGS):

Policy and Program Guidance, Application Instructions, and Formula

Allocations

1. Purpose. To provide policy and program guidance for the development, management, and delivery of Labor Market Information and Workforce Information (LMI-WI) funded through WIGS for services to job seekers, employers, educators, economic developers, and others.

### 2. References.

- Paperwork Reduction Act (PRA) of 1995 (Pub. L. 104-13 and 44 U.S.C. 3501-3520)
- 29 Code of Federal Regulations (CFR) Parts 93, 96, 97, and 98; and 2 CFR 225
- Rehabilitation Act of 1973, Section 508 as amended (29 U.S.C. 794d)
- Wagner-Peyser Act, Sections 6, 7, 10(c), and 15 (29 U.S.C. 49e, 49f, 49(i)(c), and 49(l)(2))
- Workforce Investment Act (WIA) Pub. L. 105-220, Sections 111(d)(8) and 309 (29 U.S.C. 2821(d)(8) and 49(1)(2))
- Training and Employment Guidance Letter (TEGL) No. 27-11, May 2, 2012, Program Year (PY) 2012 Workforce Information Grants to States (WIGS): Policy and Program Guidance, Application Instructions, and Formula Allocations
- 3. OMB Approval. To conform with the PRA, OMB has reviewed and approved this information collection (OMB Control Number 1205-0417), whose authorization expires May 31, 2014. Under 5 CFR 1320.5(b), an agency cannot conduct, sponsor, or require a response to a collection of information unless the collection displays a valid OMB Control Number.

RESCISSIONS None	EXPIRATION DATE Continuing
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4. Fund Allotments, Goals and Objectives. ETA is awarding \$31,939,520 in PY 2013 for WIGS. ETA distributes a total of \$176,655 to Guam and the Virgin Islands, and allocates the remaining \$31,762,865 by formula to the states, the District of Columbia and Puerto Rico. For the latter group, 40 percent is distributed equally and the remaining 60 percent is distributed based on each jurisdiction's relative share of the civilian labor force for the 12-month period ending September 2012. Attachment 1 shows the allocations. Hereafter, we have incorporated the District of Columbia and the territories into the term "state."

Each year the Employment and Training Administration (ETA) funds these LMI-WI formula grants to the states, and specifies grant requirements. State workforce agencies use WIGS to develop and disseminate essential state and local LMI-WI for job seekers, employers, educators, economic developers, and others.

The main body of this TEGL describes required, encouraged and allowable activities, and explains the rationales for ETA policies and requirements. Attachment 2 summarizes WIGS requirements, and includes important administrative details that are not covered in the body of the guidance, such as deadlines and submission requirements.

5. Required, Encouraged, and Allowable Activities. Grantees primarily serve four customer groups: 1) the public (including job seekers and employers); 2) labor market intermediaries who help individuals find a job or make career decisions (such as employment and school counselors, case managers at American Job Centers, and community-based organizations); 3) policymakers and employment and economic program planners and operators; and 4) miscellaneous other customers, including researchers, commercial data providers, and the media. Grantees have considerable flexibility to meet customer needs, but must consult their customers and prepare several types of products.

**Required products.** Grantees must produce a database (a below) plus two types of public products (b and c below). ETA encourages states to produce additional reports (d below). If the grantee does not produce a required deliverable, it must negotiate an extension and a revised schedule with the appropriate ETA regional office.

a. Workforce Information Database (WIDb). Accurate and reliable data is a cornerstone of the nation's workforce investment and employment statistics systems. The WIDb includes the most important workforce-related data elements and defines them consistently, ensuring comparability across jurisdictions. Its variables include employment projections; wages; educational programs; the locations of educational and training institutions; contact information for all U.S. employers; and occupational licenses.

States must use WIGS funds to populate, maintain, and update the WIDb, and to provide related staff training. Grantees must implement and maintain the most current version (now 2.5) of WIDb and populate all Analyst Resource Center (ARC)-designated core tables. The ARC Web site (<a href="www.workforceinfodb.org">www.workforceinfodb.org</a>) describes all required data elements and helps grantees obtain maximum benefit from the WIDb. The National

Crosswalk Service Center can help grantees to recode their occupational data, and provides a repository for other types of crosswalks (<a href="www.xwalkcenter.org">www.xwalkcenter.org</a>, or call 515-242-5034). ETA uses the WIDb to offer career information and guidance via CareerOneStop (<a href="www.careeronestop.org">www.careeronestop.org</a>), ETA's suite of national electronic tools for job seekers, labor market intermediaries such as employment counselors, employers, and many others.

b. State and local industry and occupational employment projections. These projections are the most frequently-requested type of employment statistic besides the unemployment rate. Projections are used for career guidance; to plan employment, education and training, and economic development programs; as supporting documentation to apply for Federal grants; and for many other purposes. The U.S. Bureau of Labor Statistics (BLS) funds national employment projections, but WIGS fund the state and local projections, produced by the states with assistance from ETA and BLS.

Because ETA views employment projections as among the most important products funded by WIGS, its projections requirements are more stringent than for other WIGS products (see the table below). ETA's requirements do not differ between industry and occupational projections, but vary for long-term vs. short-term projections, and statewide vs. sub-state projections. ETA grantees who are unable to produce the required projections must report this to their ETA Regional Administrator.

Grantees must use the methodology, software and guidelines specified by the Projections Managing Partnership (PMP) and its Projections Workgroup to produce all projections. To meet these requirements, ETA encourages grantees to use WIGS funding to obtain training provided by the PMP (see <a href="http://dev.projectionscentral.com/">http://dev.projectionscentral.com/</a>). Other LMI-WI staff training is also allowable using WIGS funds.

Type of industry and occupational projection	Required, encouraged and allowable activities	Applicable years for this TEGL	
Statewide long-term	10-year projections required in odd- numbered calendar years	Projected to 2022, using a 2012 base year	
Statewide short-term	<ul> <li>2-year projections submission required each year; ETA also encourages states to disseminate their short-term projections</li> <li>State may produce longer projections (e.g., 3, 4 or 5 years). ETA discourages 1-year projections, which date quickly. ETA also encourages states to disseminate these projections.</li> </ul>	Projected to 2015, using a 2013 base year	
Sub-state long-term	10-year projections required in even- numbered calendar years	NA (required next year)	
Sub-state short-term	Optional: an allowable and encouraged, but not required, activity	NA	

c. A statewide annual economic analysis report. ETA regards state economic and labor market analyses as essential to plan WIA and other Federal workforce investment system programs. Therefore, ETA requires statewide economic analysis reports, and encourages annual publication. However, ETA recognizes that conditions may not change sufficiently each year to necessitate an annual report, and gives states the discretion to determine their frequency. For years in which a comprehensive economic report is not issued, grantees must publish other, less comprehensive economic reports of value to state policymakers (including the governor and state legislature), as well as state and local workforce investment boards (WIBs).

Grantees have broad discretion over the reports' contents, but they should include analyses of trends and challenges — at both the state and sub-state levels — of such topics as gross domestic product; employment growth or decline (actual and projected); unemployment and other labor market hardship indicators (such as low earnings); critical industries and occupations; and skill shortages, mismatches and deficiencies, within the limitations of the available data. The analyses should address the jobless population as a whole, as well as the experiences, needs, and challenges of the jobless targeted populations identified in ETA WIA planning requirements specified on page 3 of <a href="http://www.doleta.gov/usworkforce/wia-planning/docs/integrated-planning-guidance.pdf">http://www.doleta.gov/usworkforce/wia-planning/docs/integrated-planning-guidance.pdf</a>.

ETA will *not* accept the following submissions for the economic analysis report or its substitute: 1) data tables alone; 2) job listings; 3) maps alone; 4) reports done by the grantee for BLS (e.g., news releases, employment situation reports, etc.); or 5) reports funded by Federal sources other than WIGS.

d. Other economic and labor market reports and products. ETA encourages grantees to produce other reports and data in addition to those specified above: grantees have wide discretion in both the topics and presentation format. These reports should include accurate data, actionable information, and resources that enable job seekers, employers, staff in American Job Centers, policy makers, and the workforce investment system to make informed decisions about the services, training, and career paths that lead to good jobs. Examples of such miscellaneous products include occupational and career guidance resources for job seekers (which may take the form of electronic self-service tools); industry- or occupation-specific research; and studies of topics of continuing interest such as labor or skill shortages, mismatches, and deficiencies. ETA encourages grantees to review the reports issued by other states to obtain useful ideas (<a href="http://www.doleta.gov/performance/results/AnnualReports/annual\_report.cfm">http://www.doleta.gov/performance/results/AnnualReports/annual\_report.cfm</a>).

Other encouraged activities. ETA strongly encourages grantees to help their state Wagner-Peyser, WIA, and other grant partners better identify and more rigorously report when participants receive workforce information services, to ensure that performance reports better measure the value and impact of LMI-WI. ETA also encourages grantees to 1) leverage WIGS funds by expanding partnerships among the workforce investment system, and education, training and economic development communities; and 2) apply for other Federal and competitive grants to complement WIGS funds.

- **6.** Required Methods. Grantees have considerable flexibility in how they carry out their work, but must meet certain methodological standards in collaborating with partners, consulting with customers, collecting data, and posting their products on the Internet.
  - a. Partnerships. In order to best serve their customers and optimize the Federal investment, grantees are to establish and maintain partnerships that grantees consider relevant and mutually beneficial. ETA believes that such partnerships can augment resources, improve program outcomes, and help LMI-WI data influence planning and program decisions.
  - b. Customer consultation. WIA Section 309(e)(2) requires states to consult with customers about the relevance of the LMI collected and disseminated, including employers; WIBs; education agencies; and others. ETA does not prescribe how grantees consult customers, and methods can include focus groups, surveys, crowd-sourcing, Webinars, listening sessions, customer satisfaction assessments, and/or other methods considered appropriate by the grantee. Grantees must document these consultations in their grant file and annual performance report.
  - c. Data collection and research methodology. All data collection activities must conform to BLS technical standards and methodologies, and if they do not, the grantee must document a defensible rationale. Information used in reports must 1) be based in part on needs identified through customer consultations and product assessments; and 2) come from credible sources that meet professional standards. Multiple sources must be used, except when the report is based upon a single survey. Sources must be clearly referenced and/or footnoted.
  - d. Publication requirements. In order to maximize the availability of LMI-WI products, grantees must post grant-funded products, reports, and workforce information on their Web sites in a readily accessible manner (unless otherwise indicated), and meet standard Federal accessibility requirements (<a href="www.section508.gov">www.section508.gov</a>). To meet this criterion, grantees may use WIGS funding to develop, maintain, improve, and/or host LMI-WI Web sites and other electronic delivery systems.
  - e. Information technology (IT) specifications. To maximize its usefulness, any IT system or application developed with WIGS is to adhere to industry-standard, open architecture principles with documentation and software made available for use by other organizations for Federal governmental purposes.

# 7. Application for Federal Assistance, Recordkeeping and Reporting Requirements.

a. Application forms. States must submit an SF 424 (Application for Federal Assistance) and SF 424A (Budget Information) to apply for this grant (see both "Action Requested" below and Attachment 2 for deadlines and other requirements). ETA regional offices review and approve WIGS applications. Following regional office approval, the ETA Grant Officer issues a Notice of Obligation (NOO).

- b. Other standard forms and files. ETA requires grantees to complete ETA Form 9130 quarterly financial reports, and to sign an annual funding agreement with ETA which includes grantee assurances and certifications. In addition, grantees must maintain their internal grant files in electronic form, and make these available upon request to ETA.
- c. Expenditures. By accepting WIGS funding, a state agrees to fulfill all work specified in this guidance. The grant performance period spans July 1, 2013 to June 30, 2014; ETA expects grantees to expend WIGS funds during this period. Grantees may request an alternative schedule from their ETA regional office, but must expend the funds within a three-year period by June 30, 2016, or the funds will be returned to the U.S. Treasury. During the performance period, the grantee and the ETA regional office may jointly adjust planned expenditures within the state's allotment. The ETA Grant Officer may reallocate grant funds within the ETA region if grantees' 1) expenditures and obligations are substantially below the forecasted levels; or 2) fail to complete required deliverables. All WIGS expenditures must support the required and allowable activities, and conform to "reasonable," "necessary," and "allocable" costs specified in 2 CFR 225. WIGS cannot be used to supplant funding from other Federal or state sources.
- d. Annual performance report. Grantees must submit an annual performance report to their ETA regional office that summarizes all grantee activities, and lists the core deliverables and activities shown below, in the order indicated.
  - Workforce information database (WIDb)
  - ii. Industry and occupational projections
  - iii. Annual economic analysis and other reports
  - iv. Customer consultations
  - v. Activities undertaken to meet customer needs
  - vi. New tools and resources
  - vii. Efforts to create and support partnerships and collaborations
  - viii. Activities to leverage LMI-WI funding
  - ix. Recommendations to ETA for changes and improvements to WIGS requirements
- 8. Additional Resources. The Workforce Information Council's (WIC) LMI Products and Customer Analysis tool can showcase state LMI-WI or research entity products and tools. Using pre-formatted spreadsheets, states can easily categorize their products and tools, identify the Web site location, and record information on views and downloads. By cross-referencing these tables with WIC's Customer Consultation Study Group product-customer matrix, states can better identify under-served customers and important unaddressed topics. WIC's reports and tools can be accessed at <a href="http://www.workforceinfocouncil.org/library.asp">http://www.workforceinfocouncil.org/library.asp</a>.
- 9. <u>Action Requested</u>. ETA requests that state workforce administrators transmit this guidance to the appropriate state workforce agency (SWA) office(s) and the state WIB. The relevant state office should submit to the ETA Regional Administrator an original and one copy of the PY 2013 grant application package, which must include a 1) transmittal letter; 2) SF 424 (Application for Federal Assistance); and 3) SF 424A (Budget Information). The transmittal

letter must be signed by either 1) the governor or 2) both the SWA administrator and the state WIB chairperson. The states must also submit the SF 424 to the <u>Grants.gov</u> Web site.

10. <u>Inquiries</u>. For questions on grant requirements and the statement of work, contact the appropriate ETA regional office. For financial management questions, contact the ETA regional office; Grants Specialist Sharon Carter at <u>Carter.Sharon@DOL.gov</u>; or Grant Officer Thomas Martin at <u>Martin.Thomas@DOL.gov</u> or (202) 693-2989.

### 11. Attachments.

- 1. Workforce Information Grants to States, PY 2012 vs. PY 2013 Allotments
- 2. Consolidated Requirements for WIGS Grantees

# Attachment 1. Workforce Information Grants to States, PY 2012 vs. PY 2013 Allotments

### U. S. Department of Labor Employment and Training Administration

#### Workforce Information Grants to States PY 2013 vs PY 2012 Allotments

State	PY 2012	PY 2013	Difference	% Difference
Total	\$31,939,520	\$31,939,520	\$0	0.00%
Alabama	508,082	507,498	(584)	-0.119
Alaska	289,182	289,152	(30)	-0.019
Arizona	634,754	611,887	(22,867)	-3.609
Arkansas	411,636	413,051	1,415	0.349
California	2,471,363	2,494,284	22,921	0.939
Colorado	574,272	577,616	3,344	0.589
Connecticut	476,928	477,665	737	0.159
Delaware	296,619_	298,044	1,425	0.489
District of Columbia	285,345	287,102	1,757	0.629
Florida	1,382,267	1,377,539	(4,728)	-0.349
Georgia	822,490	824,786	2,296	0.289
Hawaii	322,178	324,046	1,868	0.589
Idaho	338,014	339,198	1,184	0.359
Illinois	1,059,262	1,048,080	(11,182)	-1.069
Indiana	628,745	633,362	4,617	0.739
lowa	450,398	446,571	(3.827)	-0.859
Kansas	429,282	427,285	(1,997)	-0.479
Kentucky	503,058	496,768	(6,290)	-1.259
Louisiana	498,490	496,842	(1,648)	-0.339
Maine	330,165	330,683	518_	0.169
Maryland	611,479	620,509	9,030	1,489
Massachusetts	674,268	666,310	(7,958)	-1.189
Michigan	826,454	812,448	(14,006)	-1.699
Minnesota	610_066_	607,376	(2,690)	-0.449
Mississippi	409,097	407,924	(1,173)	-0.299
Missouri	616,486	612,833	(3,653)	-0.599
Montana	305,900	306,346	446	0.15
Nebraska	365,623	368,239	2,616	0.729
Nevada	406,858	411,657	4,799	1.189
New Hampshire	335,775	334,747	(1,028)	-0.319
New Jersey	797,757	803,433	5,676	0.719
New Mexico	360,655	357,589	(3,066)	-0.859
New York	1,421,421	1,408,967	(12,454)	-0.889
North Carolina	796,599	814,453	17,854	2.249
North Dakota	290,251	291,774	1,523	0.529
Ohio	968,454	950,865	(17,589)	-1.829
Oklahoma	458,559	463,255	4,696	1.029
Oregon	489,737	486,746	(2,991)	-0.619
Pennsylvania	1,024,530	1,030,074	5,544	0.549
Puerto Rico	401,448	400,028	(1,420)	-0.359
Rhode Island	314,447	312,502	(1,945)	-0.629
South Carolina	510,204	506,743	(3,461)	-0.689
South Dakota	299,393	298,818	(575)	-0.199
Tennessee	626,347_	624,764 _	(1,583)_	0.259
Texas	1,751,537	1,778,866	27,329	1.569
Utah	410,985	408,422	(2,563)	-0.629
Vermont	288,917	288,122	(795)	-0.289
Virginia	761,294	773,526	12,232 _	1.619
Washington	674,609	671,854	(2,755)	-0.419
West Virginia	340,288	342,244	1,956	0.579
Wisconsin	620,620	618,228	(2,392)	-0.399
Wyoming	280,277	281,744	1.467	0.529
State Total	31,762,865	31,762,865	<u>1,467</u> -	0.00%
Guam	92,818	93,009	191	0.219
Virgin Islands			(191)	-0.239
	83,837 _	83,646	(101)	-0.237

# Attachment 2. Consolidated Requirements for WIGS Grantees

The table below summarizes the deliverables and requirements in column 1 (the body of the TEGL explains these in full). Columns 2 and 3 contain important administrative details which have not been included in the body of the TEGL, which focuses on policy. Brackets are used in the table to indicate activities that are not required.

Deliverables and Requirements	Due Dates	Submission, Formatting
RECORDKEEPING AND REPORTING		and Other Requirements
SF 424 (Application for Federal Assistance), also at http://apply07.grants.gov/apply/forms/sample/SF424_2_1-V2.1.pdf. All sections of the form must be completed (see 424 instructions, also at http://www.grants.gov/assets/SF424Instructions.pdf).  SF 424A (Budget Information), also at http://apply07.grants.gov/apply/forms/sample/SF424A-V1.0.pdf. All sections of the form must be completed (see 424A instructions, also at http://www.grants.gov/assets/InstructionsSF424A.pdf).  If a state believes it is necessary to revise their expenditure plan due to unforeseen factors, the state may petition the regional office for approval to modify the plan.	No later than June 13, 2013, unless a later date is negotiated with the regional office	<ul> <li>States must submit the SF 424 to www.Grants.gov.</li> <li>States must submit an original and one copy of their SF 424 and 424A to their ETA regional office with a transmittal letter signed by either 1) the governor or 2) both the SWA administrator and the state WIB chairperson.</li> <li>Carry-over funds from previous program years must be displayed in 424A, section B, columns 2 and 3, with the most recent year in column 2. For columns 2 and 3, only the cells in the "TOTALS" row (row k) need be completed.</li> <li>In SF 424A, item number 23 (remarks), states must describe their spending plan for Federal WIGS funds remaining from previous program years.</li> </ul>
ETA Form 9130 quarterly financial reports. All	Transport (March 1997)	
sections of the form must be completed.	Within 45 days after the end of	

Deliverables and Requirements	<b>Due Dates</b>	Submission, Formatting and Other Requirements
<ul> <li>Annual Performance Report. The report must include hyperlinks to all products published. It must also summarize all activities, including the following.</li> <li>Describe all deliverables, highlighting new accomplishments and noting whether partnerships or collaborations were involved.</li> <li>Summarize the required customer consultations (see below) regarding products and services, including the customer needs identified. If customers identified needed improvements, state the responsive measures taken.</li> <li>Summarize partnership and collaborative efforts, including activities to leverage grant funding and new activities.</li> <li>Recommendations to ETA for changes and improvements.</li> <li>PRODUCT AND PUBLICATION</li> </ul>	September 30	Must be submitted to the ETA regional office, and signed by either 1) the governor or 2) both the SWA administrator and the state WIB chairperson
REQUIREMENTS		
<ul> <li>Product Requirements (general)</li> <li>Provide accurate and actionable information that enables informed decisions by customers, and supports the development of data-driven strategies and policies.</li> <li>Produce products benefitting the governor, state legislature, state and local WIBs, relevant stakeholders, and the public.</li> <li>[ETA encourages grantees to notify their regional office when products are posted on the Internet.]</li> </ul>	Ongoing	Documents must be formatted to permit parts to be copied (including specific words), e.g., a MS Word document or accessible .pdf formatting enabling such copying.
Publication Requirements (general). States must post all grant-funded products, reports, and workforce information on the Internet in a manner accessible to all members of the public (unless otherwise indicated), and comply with Rehabilitation Act Section 508 requirements.	Within a reasonable period after the completion of the work	States must include links to all WIGS-funded published material on their LMI Web site, and present it in a manner that makes it easy for the public to find this material.
Workforce Information Database (WIDb). Implement and maintain the most current version (now 2.5) of the WIDb and populate all designated core tables in accordance with Analyst Resource Center (ARC) guidelines (required data elements are listed at <a href="http://www.workforceinfodb.org">http://www.workforceinfodb.org</a> ).	Within 180 days from the release of a new database version	Submitted to ARC, in the manner specified by ARC [States should inform their regional office if they use supplemental or non-standard WIDb tables.]

Deliverables and Requirements	Due Dates	Submission, Formatting and Other Requirements
Licensing and certification information: states must populate the database with the license.dbf and licauth.dbf licensing files.	At least every 2 years	States must submit data through the National Crosswalk Service Center (NCSC), in the manner specified by ARC.
<b>Employment Projections (general)</b>	Ongoing	State must provide links to all published projections on a single Web page
Statewide long-term industry and occupational projections  • 10-year projections	In odd-numbered calendar years, after BLS releases national projections, by a PMP-specified date	File must be provided to the Projections Managing Partnership (PMP) in a manner to be specified by the PMP
Statewide short-term industry and occupational projections  • 2-year projections	Each year, by a PMP-specified date	File must be provided to PMP in a manner to be specified by the PMP
Sub-state long-term industry and occupational projections  • 10-year projections	In even- numbered calendar years, after BLS releases national projections, by a PMP-specified date	File must be provided to PMP in a manner to be specified by the PMP
Sub-state short-term industry and occupational projections  • [Optional: allowable and encouraged, but not required, activity]	NA	If submitted, the file must be provided to PMP in a manner to be specified by the PMP.
Annual Economic Analysis Report (or substitute as explained in the body of the TEGL). The information must be based on needs identified through customer consultations; must come from multiple, credible sources; and must be clearly referenced and/or footnoted.	Within 90 calendar days following the end of the program year	<ul> <li>Unless a product referred to is a Web site, all Internet links in the document must lead directly to the product, not to a Web site that includes the product.</li> <li>See general product and publication requirements</li> </ul>

Deliverables and Requirements	<b>Due Dates</b>	Submission, Formatting and Other Requirements
Other Published Reports. The information must be based on needs identified through customer consultations; must come from multiple, credible sources; and must be clearly referenced and/or footnoted.	Within 90 calendar days following the end of the program year	Must be formatted in a manner to permit parts of it to be copied (including specific words), e.g., a MS Word document or accessible .pdf formatting enabling such copying.
OTHER REQUIREMENTS		
<b>Spending.</b> ETA expects that grantees will spend the available funds during the allotment year, and reserves the right to reallocate funds if it is unlikely that this target will be met or if required deliverables are not submitted in a timely manner.	Ongoing	
Consultations with customers about LMI-WI	Ongoing	
<ul> <li>Customers consulted must include those specified in WIA.</li> <li>ETA does not prescribe the consultation methodology. Consultations must be documented in the grantee's internal files, and made available upon request to ETA officials.</li> </ul>		
<b>Data collection.</b> All data collection activities must conform to the BLS technical standards and methodologies. If this does not occur, the grantee must document a defensible rationale.	Ongoing	
IT systems and applications. Any IT system or application developed with WIGS is to adhere to industry-standard, open architecture principles with documentation and software made available for use by other organizations for Federal governmental purposes.	Ongoing	